

# Fact Sheet



## *For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on June 6, 2006.

Permit Number: **R30-03900001-2002-MM01**

Application Received: **February 2, 2009**

Plant Identification Number: **03900001**

Permittee: **E. I. DuPont de Nemours & Co., Inc.**

Facility Name: **Belle Plant**

Manufacturing Unit: **Specialty Chemical Intermediates (Group 5 of 5)  
(Methylamines, Amides, Dimethyl Ether, Dimethyl Sulfate, CO Flare)**

Mailing Address: **901 W. DuPont Ave., Belle, WV 25015**

*Permit Action Number: MM01 Revised: April 13, 2009*

---

Physical Location:	Belle, Kanawha County, West Virginia
UTM Coordinates:	451.848 km Easting • 4,232.589 km Northing • Zone 17
Directions:	Exit US Route 60 at the Belle Exit. Turn right onto old Route 60. Travel 500 feet west. Turn left to enter the main gate of DuPont Belle.

---

### Facility Description

The DuPont Belle Plant is a chemical manufacturing facility whose primary products are specialty chemical intermediates, plastic monomers, and agriculture intermediates. The facility divided their Title V Permit Application into five separate manufacturing units. Group 5 of 5 produces specialty chemical intermediates and includes the following process units: methylamines (monomethylamine, dimethylamine, trimethylamine, and ammonia storage), amides (dimethylformamide, monomethylformamide, and dimethylacetamide), dimethyl ether, dimethyl sulfate, the carbon monoxide flare, and drum plant.

The purpose of this minor modification is to incorporate changes made as a result of the issuance of Class I administrative update R13-0914B, issued on October 31, 2008.

## Emissions Summary

There are no emission rate changes associated with this modification.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of an individual HAP, and over 25 tons per year aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year aggregate HAPs, the DuPont Belle Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.

State Only:                      None.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-0914B	October 31, 2008	NA

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

- 1) **Removal of Condition 8.1.3.** The following condition 8.1.3 was removed from the Title V permit: "If the flare (209.001) flame goes out during the venting of carbon monoxide from the Praxair carbon monoxide plant, all such venting shall be discontinued if the flare cannot be reignited within ten (10) minutes." The carbon monoxide plant referred to in Condition 8.1.3 is owned and operated by Praxair on DuPont Belle's plant site and the flare is owned and operated by DuPont Belle. Praxair's carbon monoxide plant is permitted under R13-0891A. DuPont Belle's flare is permitted under R13-0914B. Both R13-0891A and R13-0914B were modified to remove the requirement to shut down the carbon monoxide plant in the event the flare flame goes out. The requirement was first removed from the Praxair permit as part of the R13-0891A modification, approved on August 1, 2007. Then the identical requirement was removed from DuPont Belle's permit as part of the R13-0914B Class I administrative update, approved on October 31, 2008. Since this requirement is no longer included in DuPont Belle's permit R13-0914B, it was removed from their Title V permit.
- 2) **Addition of the Active R13, R14, and/or R19 Table in Section 1.2 of the Title V permit.** The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

## Comment Period

All written comments should be addressed to the following individual and office:

Carrie McCumbers  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street, S.E.  
Charleston, WV 25304

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Carrie McCumbers  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext.1226 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

No comments were received.